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February 4, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

**Re: Beulah Solar, LLC – Request for Modification of an Interconnection
Agreement with South Carolina Electric & Gas Company
Docket Number 2018-401-E**

**Request of Eastover Solar LLC for Modification of Interconnection
Agreement with South Carolina Electric & Gas Company
Docket Number 2019-51-E**

Dear Ms. Boyd:

Enclosed for filing in connection with the above-referenced matter, please find *Joint Motion to Consolidate*.

By copy of this letter, we are serving the parties of record with a copy of the Joint Motion to Consolidate and attach a certificate of service to that effect.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'J. Ashley Cooper'. Below the signature, the name 'J. Ashley Cooper' is printed in a black serif font.

JAC:vbb

Enclosure

cc: (Via Electronic Mail and First Class Mail)
Richard L. Whitt
Dawn Hipp
Jeffrey M. Nelson

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2018-401-E and DOCKET NO. 2019-51-E

IN RE:)
)
Beulah Solar, LLC – Request for)
Modification of an Interconnection)
Agreement with South Carolina Electric &)
Gas Company,)
)
and)
)
Eastover Solar, LLC – Request for)
Modification of an Interconnection Agreement)
with South Carolina Electric & Gas Company)
)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served on this day one (1) copy of **JOINT MOTION TO CONSOLIDATE** via electronic mail and U.S. First Class Mail upon the persons named below, addressed as follows:

Richard L. Whitt
Austin & Rogers, P.A.
508 Hampton Street, Suite 203
Columbia, South Carolina 29201
Email: rlwhitt@austinrogerspa.com

Attorney for Petitioner, Eastover Solar, LLC

Dawn Hipp
Jeffrey M. Nelson
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
Email: dhipp@regstaff.sc.gov
Email: jnelson@regstaff.sc.gov

s/ J. Ashley Cooper

This 4th day of February, 2019.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2018-401-E and DOCKET NO. 2019-51-E

IN RE:)	
)	
Beulah Solar, LLC – Request for)	
Modification of an Interconnection)	
Agreement with South Carolina Electric &)	
Gas Company,)	
)	JOINT MOTION TO CONSOLIDATE
and)	
)	
Eastover Solar, LLC – Request for)	
Modification of an Interconnection Agreement)	
with South Carolina Electric & Gas Company)	
)	

The Applicants, Beulah Solar, LLC (“Beulah”) and Eastover Solar, LLC (“Eastover”) (collectively “Applicants”), and Respondent South Carolina Electric & Gas Company (“SCE&G”) (the “Parties”) jointly move the Public Service Commission of South Carolina (“Commission”) to consolidate the above dockets and proceedings and to maintain the Notice of Hearing and Prefile Testimony Letter filed in the Beulah Proceeding (“Prefile Testimony Letter”), accordingly (the “Motion”). This Motion is based upon the following:

1. Beulah filed a Request for Modification of Interconnection Agreement with South Carolina Electric & Gas Company and Motion to Maintain Status Quo on December 28, 2018 (Docket 2018-401-E) (“Beulah Proceeding”).
2. SCE&G filed its Response in Opposition to Beulah’s Request for Modification in the Beulah Proceeding on January 7, 2019.

3. Thereafter, on January 16, 2019, Eastover filed a Petition to Intervene in the Beulah Proceeding.

4. On January 18, 2019, the Commission served a Notice of Hearing and Prefile Testimony Letter for the Beulah Proceeding, and the hearing is currently scheduled for May 2, 2019.

5. SCE&G timely filed its Response in Opposition to Eastover's Petition to Intervene in the Beulah Proceeding on January 25, 2019, and Eastover's Petition to Intervene was granted by the Commission in the Beulah Proceeding on January 30, 2019.

6. In the interim, on January 24, 2019, Eastover opened Docket 2019-51-E and filed a Request for Modification of Interconnection Agreement with South Carolina Electric & Gas Company and Motion to Maintain Status Quo ("Eastover Proceeding").

7. SCE&G's Response to Eastover's Request for Modification in the Eastover Proceeding was filed on February 1, 2019.

8. Both the Beulah Proceeding and Eastover Proceeding involve the same issues of law and, therefore, pursuant to Rule 42(a) of the South Carolina Rules of Civil Procedure. Beulah and Eastover have common and aligned interests and are both seeking common, affirmative relief in this matter. The Parties therefore move to combine these two Proceedings for judicial economy and to avoid duplicative discovery. The parties intend that all filings made by Eastover in Docket 2019-51-E, be transferred to Docket 2018-401-E. After the filings in Docket 2019-51-E are transferred to Docket 2018-401-E, Docket 2019-51-E, should be administratively closed effective after the date of the transfer of the filings from Docket 2019-51-E. The Parties believe that such consolidation assures consistent application of the facts and law in both Proceedings.

9. The Parties further move to clarify the schedule directed by the Commission in its Prefile Testimony Letter, filed on January 18, 2019 in the Beulah Proceeding. For the reasons stated above namely judicial economy, due process and the avoidance of unnecessary confusion, the Parties respectfully request the Commission clarify its Prefile Testimony Letter as follows:

- a) That Applicants, Beulah and Eastover, prefile with the Commission and serve the Direct Testimony and exhibits of witnesses on all Parties of Record on or before March 21, 2019;
- b) That all other Parties, including SCE&G, prefile with the Commission and serve the Direct Testimony and exhibits of witnesses on all Parties of Record on or before April 4, 2019;
- c) That Applicants, Beulah and Eastover, prefile with the Commission and serve any Rebuttal Testimony and exhibits of witnesses on all Parties of Record on or before April 11, 2019; and
- d) That all other Parties, including SCE&G, prefile with the Commission and serve any Surrebuttal Testimony and exhibits of witnesses on all Parties of Record on or before April 18, 2019.

10. The Office of Regulatory Staff consents to this Motion.

The Parties respectfully request that the Commission grant the relief set forth hereinabove and grant such other and further relief as is just and proper.

s/ Richard L. Whitt (with permission)

Richard L. Whitt

Austin & Rogers, P.A.

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***Attorney for Beulah Solar, LLC and Eastover
Solar, LLC***

s/ Matthew W. Gissendanner (with permission)

K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

South Carolina Electric & Gas Company

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220 Operation Way

Cayce, South Carolina 29033-3701

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s/ J. Ashley Cooper

J. Ashley Cooper, Esquire

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Charleston, South Carolina 29401

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Fax: (843) 727-2680

Email: ashleycooper@parkerpoe.com

***Attorneys for South Carolina Electric &
Gas Company***

Cayce, South Carolina

This 4th day of February, 2019.